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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

STEVEN EARL CARR, an individual,

Plaintiff,

v.

UNITED STATES OF AMERICA; DAVID
N. KARPEL, individually, DOES 1 through
100; and ROES 1 through 100; inclusive,

Defendants.

Case No.: 2:20-cv-01850-GMN-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR PLAINTIFF
TO RESPOND TO MOTION TO DISMISS
FILED BY DEFENDANTS UNITED STATES
OF AMERICA AND DAVID N. KARPEL
[ECF No. 26] AND FOR DEFENDANTS TO
FILE THEIR REPLY**

(Second Request)

NOW COMES the Plaintiff, STEVEN EARL CARR, by and through his attorneys, Melanie A. Hill and Melanie Hill Law PLLC, and Defendants UNITED STATES OF AMERICA and DAVID N. KARPEL, by and through their attorneys, Assistant United States Attorney Gregory Addington, who hereby stipulate that Plaintiffs may have an extension of time from the current deadline of August 2, 2021 until August 17, 2021, within which to respond to the Defendants' Motions to Dismiss [ECF No. 26]. The parties further stipulate that Defendants shall have an extension of time from the current deadline of August 23, 2021 until September 22, 2021 to file their reply in support of the Motion to Dismiss [ECF No. 26]. This Stipulation is made at the request of all parties for the

1 reasons set forth herein and this is the first request for an extension of the deadlines to respond and
2 reply to the pending Motion to Dismiss [ECF No. 26].

3 In support of this Stipulation and Order, the parties state as follows:

4 1. The second amended complaint was filed in this case on July 2, 2021 [ECF No. 25] after
5 the Court entered an Order granting Plaintiff's Motion for Leave to File Proposed Second Amended
6 Complaint and denying Defendants' Motion to Dismiss as moot on July 2, 2021 [ECF No. 24].

7 2. Defendants filed their Motion to Dismiss Plaintiff's Second Amended Complaint on July
8 2, 2021 [ECF No. 26].

9 3. Counsel for all parties have conferred regarding Plaintiffs' request for an extension of the
10 response deadline given her recovering from injuries from two separate accidents. Counsel for
11 Plaintiff was supposed to have back procedures this week that she was unable to have due to the
12 Covid-19 pandemic because they were to take place in a surgery center setting and the numbers are so
13 high that counsel did not think it was safe to do so. As a result, counsel for plaintiff is dealing with
14 back and neck pain that make it difficult for her to work for long periods of time writing. The
15 addition time will allow her to complete the response and accommodate her pain and the limited time
16 she can work each day. Defendants have also requested an extension of their reply deadline and
17 Plaintiff has agreed.

18 4. This stipulation and order are being brought in good faith and is not sought for any
19 improper purpose or other purpose of delay, but to allow counsel for the parties' additional time to
20 respond and reply to the motion to dismiss and brief the necessary issues raised in the motion to
21 dismiss due to the reasons articulated herein.

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1 WHEREFORE, the parties respectfully request that the Court extend the deadline for Plaintiff
2 to respond to Defendants' Motion to Dismiss [ECF No. 26] from the current deadline of August 2,
3 2021 until August 17, 2021. The parties further respectfully request that the Court extend the
4 deadline for Defendants to file their reply from the current deadline of August 23, 2021 until
5 September 22, 2021.
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7 DATED this 31st day of July, 2021.

8 Respectfully submitted,

9 MELANIE HILL LAW PLLC

10 */s/ Melanie A. Hill*
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Respectfully submitted,

CHRISTOPHER CHIOU
Acting United States Attorney

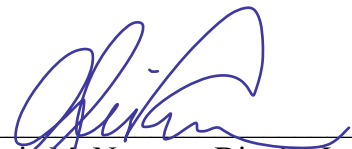
10 */s/ Gregory Addington*
11

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18 *Attorney for Defendants United States of*
19 *America, David L. Jaffe, and David N. Karpel*

20 **IT IS SO ORDERED.**

21 Dated this 2 day of August, 2021.

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Gloria M. Navarro, District Judge
24 UNITED STATES DISTRICT COURT
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